

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 21-10457 (LSS)

Jointly Administered

Objection Deadline: March 23, 2021 at 4:00 p.m. (ET)

Hearing Date: March 30, 2021 at 2:00 p.m. (ET)

**NOTICE OF MOTION FOR (I) AN ORDER (A) APPROVING BID PROCEDURES FOR
THE SALE OF SUBSTANTIALLY ALL ASSETS OF THE DEBTORS; (B) APPROVING
PROCEDURES FOR THE ASSUMPTION AND ASSIGNMENT OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES; (C) SCHEDULING THE AUCTION AND
SALE HEARING; AND (D) GRANTING RELATED RELIEF; AND (II) AN ORDER
(A) APPROVING THE SALE OF THE DEBTORS' ASSETS FREE AND CLEAR
OF ALL CLAIMS, LIENS, AND ENCUMBRANCES; AND (B) APPROVING
THE ASSUMPTION AND ASSIGNMENT OR REJECTION OF
EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

TO: (i) the Office of the United States Trustee for the District of Delaware; (ii) the holders of the 30 largest unsecured claims against the Debtors on a consolidated basis; (iii) counsel to the DIP Agent; (iv) counsel to the Prepetition Lender; (v) the California Attorney General; (vi) the Office of the United States Attorney for the District of Delaware; and (vii) all parties entitled to notice pursuant to Local Rule 9013-1(m).

PLEASE TAKE NOTICE that on March 8, 2021, the above-captioned debtors and debtors in possession (the "Debtors"), filed the *Motion for (I) an Order (A) Approving Bid Procedures for the Sale of Substantially All Assets of the Debtors; (B) Approving Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases; (C) Scheduling the Auction and Sale Hearing; and (D) Granting Related Relief; and (II) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Claims, Liens, and Encumbrances; and (B) Approving the Assumption and Assignment or Rejection of Executory*

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: MobiTV, Inc. (2422) and MobiTV Service Corporation (8357). The Debtors' mailing address is 1900 Powell Street, 9th Floor, Emeryville, CA 94608.

Contracts and Unexpired Leases (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of the order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **March 23, 2021 at 4:00 p.m. Eastern Time**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Debtor, Pachulski Stang Ziehl & Jones, LLP, Attn: Mary F. Caloway, Esq. (mcaloway@pszjlaw.com), Debra I. Grassgreen, Esq. (dgrassgreen@pszjlaw.com) and Jason H. Rosell, Esq. (jrosell@pszjlaw.com).

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON MARCH 30, 2021 AT 2:00 P.M. EASTERN TIME BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

Dated: March 8, 2021
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Debra I. Grassgreen (admitted *pro hac vice*)

Jason H. Rosell (admitted *pro hac vice*)

Mary F. Caloway (DE Bar No. 3059)

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[Proposed] *Counsel to the Debtors and Debtors in Possession*